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AUG 11 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Policies and Rules Concerning)
Unauthorized Changes of Consumers')
Long Distance Carriers)

CC Docket 94-129

DOCKET FILE COPY ORIGINAL

DECLARATION OF IVY E. WHITLATCH

I, Ivy E. Whitlatch, declare as follows:

1. I am Senior Manager, Markets, for MCI Telecommunications Corporation (MCI). In that capacity, my responsibilities include designing, directing and analyzing surveys for MCI in connection with MCI "branded" services. I have occupied my present position since 1992 and have been involved in the same line of work for the past 15 years. I have taken formal coursework in the preparation, administration and analysis of surveys in accordance with generally accepted social science and business techniques.

2. In order to determine the reasons consumers call to MCI business telephone numbers when responding to advertisements, I assumed responsibility for conducting a survey. A random sample involving 510 respondents who called MCI 800 numbers available through broadcast advertising (Advertising) or direct response mailing (Direct Response) between June 28 and July 14, 1995 was used. Interviewing was conducted by telephone on August 2nd and 3rd, 1995 by an independent third party hired by MCI to conduct the survey.

3. The results of the survey show that 81 percent of the sample participants responded to Direct Response and 19 percent of the sample participants responded to Advertising.

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4. A total of 81 percent of all those sampled reported MCI as their current long distance carrier.

5. As to the reasons those sampled called MCI, 61 percent called to switch their service to MCI. The following break-down shows other reasons for the calls:

- Get More Information 7%
- Obtain MCI Authorization to Activate Promotional Checks 3%
- Customer Service Questions 20%
- Don't Know/No Answer 7%
- Other Reasons 2%

6. As indicated above, 81 percent surveyed either called to switch their service to MCI or were current MCI subscribers with customer service questions. As indicated above, only 7 percent of those surveyed said that they called to obtain more information.

7. I have read the Commission's June 14, 1995 Report and Order, Policies and Rules Concerning Unauthorized Changes and Consumers' Long Distance Carriers, CC Docket No. 94-129. The results of the survey contradict the Commission's conclusion therein (para. 42) that "[t]ypically, the consumers, [when they call an IXC] in response to an advertisement, are just requesting general information about the IXC and do not intend to initiate a PIC change."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

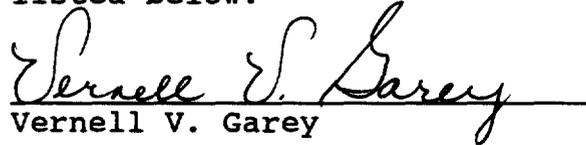
Executed on August 11, 1995.

City/County of Arlington
Commonwealth/State of VIRGINIA
Sworn to and subscribed before me this 11th day
of Aug., 1995. Witness my hand and official seal.
Susan Gandy, Notary Public
3/31/98
(Print your expiration date above)

Ivy E. Whitlatch
Ivy E. Whitlatch

CERTIFICATE OF SERVICE

I, Vernell V. Garey, hereby certify that the foregoing "MCI PETITION FOR LIMITED RECONSIDERATION" was served this 11th day of August, 1995 by mailing copies thereof, postage prepaid, to the following persons at the addresses listed below:


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